UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff, Case No. 19-20100
HONORABLE NANCY G. EDMUNDS

 \mathbf{VS}

D-3 TAMARA ROSE,

Defendant.		

PAMELLA R. SZYDLAK (P 49783) Attorney for Defendant 615 Griswold 1620 Ford Building Detroit, Michigan 48226 (313) 963-6660

JOHN N. O'BRIEN II Assistant U.S. Attorney 211 W. Lafayette, Suite 2001 Detroit, Michigan 48226 (313) 226-9100

MOTION FOR A DOWNWARD DEPARTURE
AND/OR VARIANCE FROM THE SENTENCING GUIDELINE RANGE

NOW COMES, TAMARA ROSE, Defendant herein, by and through her attorney, Pamella Szydlak, and pursuant to 18 U.S.C. Section 3553 and for the

reasons stated in the attached brief, moves this Honorable Court for a variance from the sentencing guideline range.

Respectfully Submitted,

S/Pamella R. Szydlak

PAMELLA R. SZYDLAK (P 49783) Attorney for Defendant 615 Griswold, 1620 Ford Building Detroit, Michigan 48226 (313) 963-6660

DATED: February 14, 2020

I hereby certify that on February 14, 2020, I electronically filed the foregoing Motion with the clerk of the court using the ECF system which will send notification of such filing to the following: john.obrien@usdoj.gov and all other attorneys of record.

S/Pamella R. Szydlak

PAMELLA R. SZYDLAK (P 49783) Attorney for Defendant